

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

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|---------------------|---|------------------------|
| HUEYLI LI | : | |
| Plaintiff | : | CASE NO. 5:21-cv-02277 |
| v. | : | JUDGE SARA LIOI |
| UNIVERSITY OF AKRON | : | |
| Defendant | : | |

**REPORT OF PARTIES' PLANNING MEETING
UNDER FED.R.CIV.P. 26(f) AND LR 16(b)(3)**

1. Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16.3(b)(3), a meeting was held electronically on March 2, 2022 and was attended by: Lead Counsels
2. Lead Counsel for Plaintiff Hueyli Li is Gary A. Reeve
Lead Counsel for Defendant University of Akron is Sarah J. Moore
3. The parties have exchanged the pre-discovery disclosures required by Fed.R.Civ.P. 26(a)(1).
4. The parties recommend the following track: Standard
5. The case is suitable for Mediation.
6. The parties do not consent to the jurisdiction of the U.S. Magistrate.
7. The litigation alleges that national origin and/or race was a factor that caused Plaintiff to be subject to being part of the group of employees laid off by Defendant in August of 2021. Defendant denies Plaintiff's allegations and avers the financial catastrophic circumstances created by the COVID-19 pandemic necessitated Defendant's implementation of a reduction in force.
8. April 30, 2022 shall be the cutoff date for any amended pleadings or addition of other parties.
9. (a) Recommended Discovery Plan: There should be no limitations beyond those in the Fed.R.Civ.P. on the number of Interrogatories, Documents Requests and/or Requests for Admissions. Depositions shall be limited in length to one day of no more than seven (7) hours. The parties shall be limited to no more than 10 depositions. The subject of all discovery will be the reduction in force implemented by Defendant and the abolishment of the position held by Plaintiff.

- (b) Non-expert discovery cut-off date: December 15, 2022
- (c) The parties have agreed to follow the default standard for discovery of ESI (Appx. K to N.D. Ohio L.R.)
- (d) Plaintiff's expert cut-off date: September 30, 2022
- (e) Rebuttal expert date: November 30, 2022
- (f) Expert discovery cut-off date: January 31, 2023
10. (a) Recommended dispositive motion due date: February 28, 2023
- (b) Opposition to dispositive motion due date: March 30, 2023
- (c) Reply in support of dispositive motion date: April 20, 2023
11. Recommended date for status hearing: August 31, 2022
12. Recommended date for Final Pre-Trial Conference: July 15, 2023
13. Recommended trial date: August 1, 2023
14. Other matters for the attention of the Court:

Jointly submitted,

/s/ Gary A. Reeve

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